

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUAN CARLOS AMOR GARCIA and OCEAN CREEK
INTERNATIONAL LLC,

Plaintiffs,

v.

11 Civ. 3859 (RMB)

ERNESTO COLMAN MENA, JAVIER ARTEGA,
DYLAN JEANNOTTE, PEDRO LANGA, EAST RIVER
INTERNATIONAL LLC, ANTONIO THOMAS
INTERNATIONAL CORPORATION d/b/a/ VITAL
DENT, GS ZAPA INTERNACIONAL, S.L., HUDSON
RIVER INTERNATIONAL LLC, and WALLKILL
CREEK INTERNATIONAL LLC,

Defendants.

**NOTICE OF MOTION TO DISMISS PLAINTIFFS'
VERIFIED FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the Declaration of John Dellaportas dated October 20, 2011, and the documents annexed thereto, and for all the reasons set forth in the accompanying Memorandum of Law, defendants hereby move this Court, pursuant to Fed. R. Civ. P. 12(b)(2) and (6), to dismiss Plaintiffs' Verified First Amended Complaint.

Dated: New York, New York
October 20, 2011

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